

DOCKET NO. 93-03-016 (EDSC01-93016)
SERIAL NO. 10/675,059
PATENT

REMARKS

Claims 1-20 are pending in the application.

Claims 1-20 have been rejected; all rejections are traversed.

Reconsideration of the claims is respectfully requested.

I. CLAIM REJECTION UNDER 35 U.S.C. §102

Claims 1-20 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 2002/0002625 to *Vange, et al.*, hereinafter “Vange”. This rejection is respectfully traversed.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. MPEP § 2131, p. 2100-67 (8th ed., rev. 5, August 2006) (*citing In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990)). Anticipation is only shown where each and every limitation of the claimed invention is found in a single prior art reference. *Id.* (*citing Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987)).

Claim 1 requires, among other limitations, substituting automatically a plurality of standards noncompliant hyperlinks within said first metamodel system with a plurality of standards-compliant hyperlinks. This is not taught or suggested by Vange.

Vange teaches rewriting HTML links. It is important to note, however, that these are standard HTML links both before and after the “rewriting”, and so Vange does not teach any “standards noncompliant hyperlinks.” Vange’s system rewrites standard HTML links having

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absolute addresses with standard HTML links having relative addresses, but does not rewrite any standards-noncompliant hyperlinks. In fact, Vange indicates that relative and absolute addressing are, in theory, functionally equivalent to the client, further indicating that these are both standard hyperlinks.

The Examiner's response ignores the plain language of the claims. The Examiner ignores the plain meaning of the terms "standards compliant" and "standards noncompliant", which clearly indicate whether or not the described object is compliant with a standard. Instead, the Examiner interprets these as "compliant with said second metamodel system". This is contrary to the plain language of the claims, and contrary to the use of the terms in the application itself.

Vange simply replaces standard HTML links having absolute addresses with standard HTML links having relative addresses in an intermediate server as data is communicated between a client and server. Vange doesn't address standards noncompliant features at all, and does not function to convert a first metamodel system that is standards-noncompliant into a second metamodel system that is standards-compliant.

Even the Examiner's argument in response, that the reformatted links are in the "standard" of the client system, fails to reach the limitations of the claims, as nothing in Vange "yields" a second metamodel system, as claimed.

Claim 1 describes a method for converting a first metamodel system that is standards-noncompliant into a second metamodel system that is standards-compliant, and this is not addressed

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by Vange at all. Vange simply adjusts a server communication to the requirements of a client, and has nothing to do with metamodel systems at all.

Claim 1 also requires, among other limitations, substituting automatically a plurality of standards-noncompliant entity names associated with entities of said first metamodel system with standards-compliant entity names. This is not taught or suggested by Vange.

The Examiner indicates a number of paragraphs of Vange, and some of these do reference domain names, but Vange only discusses domain names and substitutions within the context of standard domain-name resolution, and in fact refers to "standard programs" such as resolver 305 to perform the resolution. Vange does not teach or suggest any standards-noncompliant entity names at all, and does not substitute any with standards-compliant entity names, as claimed.

Claim 1 also requires, among other limitations, substituting automatically a plurality of standards noncompliant file names for associated files within said first metamodel system with a plurality of standards compliant file names for said associated files. This is not taught or suggested by Vange. Vange does not address file names at all, neither standards-compliant nor standards-noncompliant.

Claim 1 also requires, among other limitations, organizing said entities having standards-compliant entity names into a plurality of files and folders having standards-compliant file names. This is not taught or suggested by Vange. Vange does discuss file servers and services, but does not discuss file names nor folders, whether standards compliant or non-compliant.

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Other limitations are also not taught or suggested by Vange, but the distinctions discussed above with regard to claim 1, and the similar limitations of claims 10 and 19, clearly demonstrate that none of the claims are or can be anticipated by Vange. The dependent claims include many features not taught or suggested by Vange – particularly those regarding metamodel systems and specific conversion methods – and these will each be discussed at length should an appeal be necessary.

Independent claims 1, 10, and 19 were also rejected as anticipated by “Vignette Engineering – Integration of Vignette V6 Content Suite and IBM Web Sphere Commerce Suite 5.1” (“Vignette”).

First, all the arguments above with regard to standards compliant and noncompliant hyperlinks, names, etc., apply here as well and are incorporated by reference. Vignette also does not teach or suggest these claimed features.

Further, Vignette does not teach or suggest the various claimed automatic substitutions and conversions at all. The Examiner merely references different figures, showing different screenshots, and alleges that this somehow teaches the claim limitations. It certainly does not. The Examiner is invited to show relevant and enabling teachings in this reference, for each of these claim elements, in any Advisory Action, as the Examiner will certainly be obligated to do so on appeal.

On page 4, Vignette does make a statement that the “Servlet Web Path” must be changed according to the servlet 2.2 standard – but indicates that this is a function that must be performed by the user in the box shown in Figure 4, and is not something performed automatically, as required by the claims.

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All rejections are traversed. Accordingly, the Applicant respectfully requests the Examiner to withdraw the § 102 rejection with respect to all claims.

CONCLUSION

As a result of the foregoing, the Applicant asserts that the remaining claims in the Application are in condition for allowance, and respectfully requests that this Application be passed to issue.

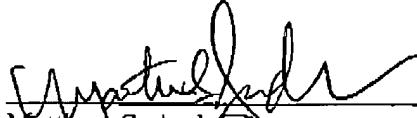
If any issues arise, or if the Examiner has any suggestions for expediting allowance of this Application, the Applicant respectfully invites the Examiner to contact the undersigned at the telephone number indicated below or at *manderson@munckbutrus.com*.

The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

MUNCK BUTRUS CARTER P.C.

Date: 04/07/08


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